



August 28th, 2014

José A. Rivera, BSCE
Senior Environmental Engineer
Environmental Protection Agency - Region 2
Caribbean Environmental Protection Division
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Guaynabo, PR 00968-8069

USEPA
RECEIVED
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**RE: Updated Stormwater Pollution Prevention Plan & Drawings
NPDES Water Compliance Inspection Report
Road PR-9 Construction Project (AC-00911)
2012 CGP Tracking Number PRR12A316**

Dear Engineer Rivera:

First of all thank you for your time during our several meetings and conversations. The purpose of this letter is to respectfully provide additional information for several tasks that are currently being undertaken on the above referenced project / matter.

In summary, FASA continues the implementation of the required NPDES control measurements, documents and related amendments. We are currently working on reviewing the latest EPA comments to the project SWPPP and its related attachments that were received last Friday August 25, 2014. Please note that FASA, on the previous meetings and submittals to the USEPA via the project owner has pretty much answered most of the findings related to the EPA site visit inspection report received by FASA on July 30, 2014.

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Once EPA comments on the latest communication from August 25, 2014 are included by all parties on the applicable documents and drawings, FASA will proceed to sign a revised SWPPP and review the applicable documentation. Please note that, in the meantime, FASA continues to implement all erosion control improvements, required reports, training, etc.

With regards to the proposed site meeting, we kindly request that such a site visit be undertaken the during the week of September 15, 2014 as engineer Oscar Santiago will be on a well deserved vacation until the second week of September 2014. We will appreciate if the site visit could occur on Thursday September 18, 2014 and if needed Friday September 19, 2014. During Mr. Santiago's vacation, Engineer Cesar Soto will be responsible for project daily activities but, based on our experience, Mr. Santiago will be key to accurately communicate any immediate project needs, budget, schedule related matters to FASA management during the project field visit.

As the United States Environmental Protection Agency (EPA) is aware, the ongoing construction team has continued the implementation of several activities, including document revisions to continue the project compliance. In summary, as to improve the project original erosion control design, FASA has undertaken a redesign effort for the temporary erosion project control improvements that has been depicted on several sets of design drawings and related documents which have been submitted to the EPA. Based on the revised design drawings, FASA has been authorized the development and continued construction for several parts of the construction project. Also, a design revision related to the permanent erosion control measurements has been completed by the project owner and has been filed and reviewed by the EPA. Once the final design revisions to the drawings and documents are completed by all parties, an amended Stormwater Pollution Prevention Plan (SWPPP), a draft of which has also been submitted and reviewed by the EPA, will also be signed by FASA. FASA will continue its implementation by superseding / amending the original SWPPP that was prepared by FASA on September 2012.

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The following list provides some information / summary related to EPA's comments included on the site inspection report received on July 30, 2014:

1. **Project beginning date of September 17, 2012, Project Completion Date of September 1, 2015** – Project was contracted by the project owner to FASA on or about September 7, 2012, a notice to proceed was provided after the contract was signed by the project owner to FASA on or about September 7, 2012, FASA's mobilization began on or about October 1, 2012, construction related earth disturbing activities began on or about November 5, 2012. With regards to the project completion date, based on the current project status it is estimated that it will be on or about September 26, 2016.
2. **NOI Dates of October 9, 2012 & November 28, 2012** – The project original Stormwater Pollution Prevention Plan (SWPPP) was prepared by FASA on September 2012. Based on the data reviewed, it seems some kind of computer technology related confusion might have occurred with regards to two NOI's for the project. Fortunately, it seems FASA has fulfilled the NOI submittal on October 2012 and then again on November 2012, which is the current project NOI. An updated project NOI will be prepared and filed once all revised drawings and revised SWPPP is completed by FASA and the project owner.
3. **SWPPP dated September 15, 2012** – The original project SWPPP was completed on September 15, 2012.
4. **Perimeter Controls** - FASA has continued the installation and maintenance of project silt fences on areas of the site that receive storm water runoff from earth disturbing activities. During the development of the project, some major storm events have occurred and field adjustments have been undertaken. These field adjustments, as well as additional erosion control measurements planned for the project, are depicted on the updated temporary and permanent erosion control drawings that have been submitted to the EPA. The perimeter of the project that will include erosion control measurements will be limited to the areas where stormwater flow could leave the project site as depicted on the set of drawings that have been prepared by FASA and the project owner.

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5. **Controlled Entrance / Exits for Sediment Track-Out Controls** – During the development of the project FASA has built several stabilized construction areas with crushed stone as required by the project original erosion control drawings. As part of the revised set of temporary erosion control drawings, FASA is undertaking the improvements and/or establishment of three (3) entrances/exits at the Project, one entrance/exit per project area. These areas are shown on the revised set of drawings that have been submitted to the EPA and more detail will be proved as per the latest EPA comments received on August 25, 2014.
6. **Control Discharges from Stockpiled Sediment or Soil** – The project has been developed using three stockpile areas. Two (2) Stock Pile Areas are located adjacent to the project premises: Stockpile Area 1 consists of 17 acres, and Stockpile Area 2 consists of 15 acres. Also, a third Stockpile Area for the project is located at Cemex Cantera Site Plant located at road PR-123, Km. 8.2, Ponce, PR. Stockpile areas located adjacent to project have been included on the erosion control improvements that are being undertaken by FASA.
7. **Control of Dust** – FASA plans to use two truck water tanks for the project. Should a major lack of rainfall and fugitive dust event occur during the project development, FASA would use additional truck tanks until the dust is controlled. Some of these additional trucks are available at other FASA projects (water tank-mounted) and or will be rented
8. **Protection of Storm Inlets** – FASA has provided and/or is in the construction process to provide the required protection to completed stormwater inlets. Once built, stormwater inlets will continue to be protected as per the erosion control drawings that have been developed for the project.
9. **Erosion and Sediment Controls for Constructed Storm water Conveyance Channels** – FASA has provided and/or is in the construction process to provide the required protection to completed stormwater channels. Once built, stormwater channels

will continue to be protected as per the erosion control drawings that have been developed for the project.

10. **Soil Stabilization** - As previously informed to the USEPA on our previous meetings, a revised set of drawings and specifications has been prepared (Permanent Slope Stabilization Erosion Control Measurements) which depicts the slopes that have been substantially completed and that could begin final stabilization measurement process once a final design decision is received from owner and comments have been received by the EPA on August 25, 2014. Latest comments from the USEPA (8/25/2014) are being reviewed by FASA and the project owner. It shall be noted that some minor grading activities will still need to be undertaken on most project slopes as to provide some finish grading detail prior to the final installation of the proposed erosion control blankets and/or the final design requirements.
11. **Controls for the Storage, Handling, and Disposal of Construction Products, Materials and Wastes** – This area has been located just adjacent to the project construction management and has been included on the project SWPPP document on the Spill Prevention Control and Counter measurement Plan attachment.
12. **Staff Training** – Training activities continue to be undertaken on the project, and an assistance log will be included on the project SWPPP. FASA will continue to provide NPDES related training to its employees.
13. **Silt Fence along Project Boundary** – FASA has continued the installation and maintenance of installed the project silt fences on areas of the site that receives storm water runoff from earth disturbing activities. Installation and maintenance continues to be undertaken as per the revised set of erosion control drawings.
14. **Temporary Access Stabilization** – During the development of the project FASA has built several stabilized construction areas with crushed stone as required by the project erosion control drawings. As part of the revised set of temporary erosion control drawings, FASA is undertaking the improvements and/or establishment of three (3) entrances/exits at the Project, one entrance/exit per

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project area. Installation and maintenance continues to be undertaken as per the revised set of erosion control drawings.

15. **Constructed Storm water Conveyance Channels (Erosion Controls and Velocity Dissipation Devices)** – Check dams are depicted on revised set of Erosion Control Improvement Drawings that have been submitted to the EPA. Also, the project designer has included the required final drainage piping, headwalls, riprap related infrastructure on the project drainage design, which will be included as part of the revised SWPPP.
16. **Sediment Basins** – Some sedimentation traps were established on the project prior to the EPA site visit. Sedimentation traps have been included on the revised drawings. Installation and maintenance continues to be undertaken as per the revised set of erosion control drawings.
17. **Concrete Washout Areas** – Concrete washout areas have been included on the revised set of erosion control drawings. Also, it shall be noted that if a local / regional concrete supplier is used for future concrete pouring events, the supplier will be asked to perform washout operations at their local plant. Should a concrete washout operation need to occur within the project premises, this activity will be undertaken as using the concrete washout area detail included on the revised set of drawings. Please note that these areas will be temporary and relocated along the project based. Once concrete washout areas are not needed, concrete will be either recycled for uses within the project premises or disposed at an approved disposal facility.
18. **Storage, Handling and Disposal of Construction Products, Materials and Wastes** – Project related construction materials areas stored with the applicable security inside the project premises. Raw materials, maintenance related materials are stored in a warehouse area that has been shown on the revised set of drawings. Non-hazardous solid waste including construction and demolition waste is properly disposed with authorized haulers and landfill facilities. The details of the companies that are currently hired by FASA for the proper management of waste related materials has been included on the SWPPP.

19. **Nearby Residential Community** – During the development of the project, FASA as well as the project owner have been understanding of the nearby community concerns and comments. FASA will continue to provide the applicable community communication and support when feasible and required. It is FASA's commitment to have a good neighbor policy even for a cumbersome project such as this one. Unfortunately some permitted environmental related matters will always occur, as the construction activities need to continue to be undertaken. These were analyzed by the project owner during the planning and environmental documents stages project and FASA will continue to follow the applicable construction permit related documents as to be able to speed construction up and finalize the project for the owner and the nearby community.

20. **Modification of SWPPP** – As previously mentioned on this letter a revised SWPPP is being undertaken and revised by all applicable parties. Latest EPA comments have been received on August 25, 2014 and most of them will be included and/or clarified on the applicable documents and/or drawings.

21. **Inspection Reports of SWPPP and Rain Gauge Data** - As previously mentioned on this letter a revised SWPPP (including updated inspection reports) is being undertaken and revised by all applicable parties. Latest EPA comments have been received on August 25, 2014 and most of them will be included and/or clarified on the applicable documents and/or drawings.

FASA again must appreciate your time and assistance in this matter. Should you need any additional information, please feel free to contact us at your convenience.

Regards,


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